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November 5, 2010

Ms. Verneta Simon  
On-Scene Coordinator  
U.S. EPA Region V  
Emergency Response Branch II, Response Section III  
77 West Jackson Blvd Mail Code SE-5J  
Chicago, IL 60604

EPA Region 5 Records Ctr.



381294

Re: Response to USEPA Comments  
Wabash River Bank Coal Tar Mitigation  
Former Western Tar Products Site  
Terre Haute, Vigo County, Indiana

Dear Ms. Simon:

KERAMIDA Inc. (KERAMIDA), on behalf of CAVU OPS Inc., is pleased to submit this letter in response to the U.S. EPA Comment Letter, dated September 2, 2010, for the former Western Tar Products Corporation facility located at 2525 Prairieton Road, Terre Haute, Indiana (Site). The U.S. EPA comments were in regards to the Wabash River Coal Tar Mitigation project located in the southern portion of the Site. According to the comment letter, U.S. EPA reviewed the Remediation Work Plan (RWP) prepared by KERAMIDA for the "Process Area" of the Site, dated May 13, 2010, and Indiana Department of Environmental Management's (IDEM's) technical review of the RWP, dated August 17, 2010. The RWP was prepared to present closure sampling data and a risk evaluation for soil and groundwater in the "Process Area" at the Site, which is the area for which a Covenant Not To Sue is being sought through the IDEM Voluntary Remediation Program (VRP). The "Process Area" is located in the northern portion of the Site.

According to the September 2, 2010 comment letter, U.S. EPA has re-evaluated its position on the Wabash River Bank Coal Tar Mitigation Work Plan, dated December 7, 2009, following its review of the "Process Area" documents. The U.S. EPA comments are specific to sampling requirements for the area between the western berm and the eastern property boundary, which were documented in a March 18, 2010 email.

Based on its re-evaluation, U.S. EPA proposed the following phased approach:

1. 7 test pits ( Test pits extended to a depth of 6 feet);
2. 13 borings at least 5 feet below the water table;
3. Sampling in the Wabash River, if the river is low, otherwise, this can be done after the Indiana Bat season or concurrent with remediation;
4. Final report for 1-3;
5. Remediation based on review of #4.

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After further consideration, CAVU OPS Inc. and KERAMIDA agree to complete investigation of coal tar occurrence prior to remediation activities. Therefore, CAVU OPS Inc. and KERAMIDA agree to complete the phased approach proposed by the U.S. EPA with a slight modification. Approximately seven proposed borings located in the western and far southern portions of the Site appear to be located in wooded and/or steeply sloped areas. KERAMIDA proposes to have the ability to move these borings slightly when in the field to areas accessible to a drill rig without significant ground clearing or slope modifications if such concerns are present.

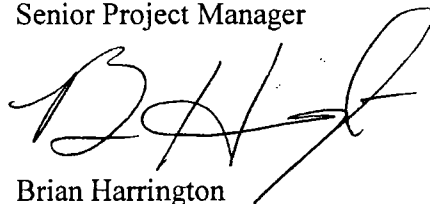
It should be noted that that coal tar found along the Wabash River bank most likely came from historical "Process Area" operations. CAVU OPS Inc. and KERAMIDA believe it is unlikely that coal tar occurrence in the "Process Area" in the northern portion and the coal tar seeps along the Wabash River bank in the southern portion of the Site are connected by subsurface migration. The proposed investigation activities should confirm this belief.

Should you desire additional information or clarification regarding this correspondence, please contact Mr. Brian Harrington at 685-6600.

Sincerely,  
KERAMIDA Inc.



Frank West, L.P.G.  
Senior Project Manager



Brian Harrington  
Vice President

cc: Joseph B. Card, CAVU OPS Inc.  
Robert R. Clark, Taft Stettinius & Hollister LLP